

April 27, 2018

Mr. Jeff Jordan
Office of Complaints Examination & Administration
Federal Election Commission
1050 First Street NE
Washington, DC 20463

FEDERAL ELECTION
COMMISSION

2018 APR 27 PM 4:42

CELA

Re: MUR 7341 – Law for Congress (Terminated) and Laurie Breininger

Dear Mr. Jordan:

I am writing in response to your March 8, 2018 letter notifying me that a complaint was filed against "Law for Congress (Terminated)" and me as committee treasurer. I was the treasurer of Law for Congress in 2015 and 2016. The committee was the principle campaign committee for Philip J. Law, my nephew, for the 2016 election. Philip was a candidate for about 15 months, from March 2015 until he lost his primary election on June 7, 2016. The committee filed a termination report on June 8, 2016, which was accepted by the FEC, and it no longer exists.¹ In addition to my response on behalf of the terminated committee, Philip's separate response addresses the loan and contributions he made to Law for Congress as well as the sources of his personal funds.

Alleged Contributions in the Name of Another

The complaint alleges that Law for Congress knowingly accepted contributions in the name of another from Philip's extended family, and that one or more of Philip's relatives were the original source of the funds. The only evidence the complaint offers to support this allegation is that numerous extended family members contributed to Philip's 2016 campaign shortly after he became a candidate and Philip's younger brother was a college student at the time of his contribution.

Philip has a large, close-knit extended family. I am one of 18 aunts and uncles, and he has 62 cousins on his mother's side of the family and 29 extended family members on his stepfather's side of the family. We were all very excited about Philip's campaign. He is the first member of any of our families to run for public office. All extended family members were personally asked to help kick-start Philip's 2016 campaign by making a contribution and/or volunteering their time. Of Philip's 100+ extended family members, only a small number actually made a contribution. Some family members contributed the maximum amount, while others contributed what they could afford. Many family members did not contribute at all, instead choosing to volunteer their time.

¹ The FEC committee ID number for Law for Congress (Terminated) is C00573766. Philip decided to run for Congress again in 2018, and his principle campaign committee for the 2018 election cycle is also named Law for Congress with FEC committee ID number C00641563. I am not associated with the 2018 campaign.

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To the best of my knowledge, information, and belief, every family member who made a contribution to the Law for Congress committee did so from their own personal funds. I am not aware of anyone reimbursing a family member for his or her contribution or giving money to a family member to contribute to Philip's campaign. The only contribution specifically questioned in the complaint was made by John-Michael Allaire, Philip's younger brother, who was a college student at the time he contributed. The responses submitted by John-Michael Allaire and his mother, Beth Garcia, refute this allegation. Based on this information, I am confident the committee did not accept contributions made in the names of others.

Allegations Related to the Candidate's Personal Funds

The complaint alleges that Philip did not have sufficient personal funds to make a small loan (\$8,500) and modest amount of contributions (\$19,635.08) to his 2016 campaign or support himself and his family during his 2016 campaign. I have compiled Philip's loan and contributions to the 2016 campaign as follows:

Date	Amount	Purpose
2/22/2015	\$1,500.00	IN-KIND - SBE CAMPAIGN CONSULTING
2/23/2015	\$80.00	IN-KIND - PO BOX ANNUAL FEE
3/3/2015	\$65.00	IN-KIND - CENSUS MAPS
3/10/2015	\$8,500.00	CANDIDATE LOAN ²
3/14/2015	\$120.00	IN-KIND - COUNTY REPUBLICAN ADVERTISING
3/22/2015	\$118.00	IN-KIND - CAMPAIGN PARTNERS WEB HOSTING
3/27/2015	\$640.00	IN-KIND - RV RENTAL
4/1/2015	\$47.07	IN-KIND - OFFICE SUPPLIES
4/1/2015	\$500.00	IN-KIND - RV RENTAL
4/4/2015	\$505.01	IN-KIND - OFFICE SUPPLIES
5/1/2015	\$500.00	IN-KIND - RV RENTAL
6/1/2015	\$500.00	IN-KIND - RV RENTAL
7/30/2015	\$500.00	IN-KIND - RV RENTAL
8/30/2015	\$500.00	IN-KIND - RV RENTAL
9/1/2015	\$500.00	IN-KIND - RV RENTAL
10/1/2015	\$500.00	IN-KIND - RV RENTAL
11/1/2015	\$500.00	IN-KIND - RV RENTAL
12/1/2015	\$500.00	IN-KIND - RV RENTAL
1/31/2016	\$500.00	IN-KIND - RV RENTAL
2/9/2016	\$12,200.00	IN-KIND - CAMPAIGN EXPENSES
2/29/2016	\$500.00	IN-KIND - RV RENTAL
3/31/2016	\$500.00	IN-KIND - RV RENTAL
4/1/2016	\$500.00	IN-KIND - RV RENTAL
5/1/2016	\$500.00	IN-KIND - RV RENTAL
5/29/2016	\$5,000.00	CANDIDATE CONTRIBUTION

² Law for Congress (Terminated) inadvertently reported the loan twice.

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6/1/2016	\$125.00	IN-KIND – RV RENTAL
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This list shows that Philip provided the campaign committee:

- One loan of \$8,500;
- One monetary contribution totaling \$5,000; and
- In-kind contributions totaling \$22,400.08.

Of the total in-kind contributions, \$7,765 did not require Philip to spend funds. Philip's campaign used an RV that Philip personally owned and we reported the value of the campaign's use of the RV as an in-kind contribution from Philip. We calculated this value by researching the going daily rental rate for a similar RV and we described the in-kind as "RV Rental" although no rental payments were made for the RV because Philip owned the RV. Philip personally paid \$12,200 in out-of-pocket campaign expenses, which he told me he paid for using funds he received from a sale of stock. The remaining in-kind contributions totaled \$2,435.08. I have every reason to believe that Philip had sufficient personal funds in his bank account and other personal earnings to cover that amount.

Philip's explanation of his own finances and how he covered these expenses is enclosed. Philip represents that he had \$13,872.24 in his bank account at Navy Federal Credit Union as of March 10, 2015 when he commenced his campaign and that he sold assets (guns, personal property, and stock) totaling \$29,292.66 over the 15-month period that he was a candidate. Those assets were more than sufficient to cover his campaign contributions and the loan.

Allegations Against Me Individually

I can only assume that the FEC has asked me to respond to the complaint in my "individual" capacity because the complaint claims that family members made contributions in the name of another or paid for Philip's living expenses while he was a candidate.

First, in addition to volunteering as treasurer, I also made a \$2,700 contribution to Philip's 2016 campaign. I made this contribution from my personal funds, and was not reimbursed or given funds by anyone else to make this contribution. Moreover, I did not reimburse or give funds to anyone else for them to contribute to Philip's 2016 campaign.

Second, I never gave Philip any money for the purpose of funding his campaign or paying for his basic living expenses. While I did give gifts to Philip and his family during his 2016 campaign, I did not give them extraordinary or unusual gifts or pay for their living expenses. My only monetary gifts to Philip and his family were gift cards totaling \$500 that I gave them at Christmas. The gifts I made to Philip and his family during his 2016 campaign were the kinds of gifts that I have made over many years, having nothing to do with the fact that Philip was running for office. For example, I frequently paid for meals when we dined out together. I gave Philip and his family customary gifts at Christmas and on their birthdays. These gifts were comparable in value to what I have given to other family members and Philip's family over

many years. One of my sisters and I also paid for our extended family's vacations, which Philip's family attended. We have paid for these extended family vacations since Philip was a child. I also paid for Philip's children's summer camp near my home, and I have done this since each child was old enough to attend summer camp. My gifts to Philip and his family during his 2016 campaign were consistent with my customary gift-giving patterns prior to 2015 and over many years.

As explained above, the complaint's allegations are easily refuted by the facts. The FEC should promptly dismiss the complaint.

Sincerely,



Laurie J. Breininger

April 27, 2018

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